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Counsel for Flextronics International Asia-Pacific Ltd. and Flextronics Technology (M) Sdn. Bhd.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

----X

In re : Chapter 11

DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)

Debtors. : (Jointly Administered)

----X

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that pursuant to Section 546(c) of Title 11 of the United States Code, Section 2-702 of the Uniform Commercial Code, applicable state law, and the Order Under 11 U.S.C. §§ 362, 503, and 546 and Fed. R. Bankr. P. 9019 Establishing Procedures for the Treatment of Reclamation Claims, dated October 13, 2005 [Dkt. 230], establishing procedures for the treatment of reclamation claims in the bankruptcy cases of the above-captioned debtors and debtors-in-possession (collectively the "Debtors"), Flextronics International Asia-Pacific Ltd., Flextronics Technology (M) Sdn. Bhd., and certain of their

In certain of the documentation with the Debtors regarding the goods sought to be reclaimed, Flextronics International Asia-Pacific Ltd. is sometimes referred to as "Flextronics Asia-Pacific Ltd."

In certain of the documentation with the Debtors regarding the goods sought to be reclaimed, Flextronics Technology (M) Sdn. Bhd. is sometimes referred to as "Flextronics Technology (Mauritius) S/B."

05-44481-rdd Doc 409 Filed 10/19/05 Entered 10/19/05 17:52:38 Main Document Pg 2 of 20

affiliates (collectively "Flextronics"), served on October 18, 2005 a written supplemental demand for reclamation of goods (the "Supplemental Reclamation Demand"), as a supplement to the initial written reclamation demand (the "Initial Reclamation Demand") sent by Flextronics on October 13, 2005, upon one or more of the above captioned Debtors, related entities, and the Debtors' attorneys of record.

A true and correct copy of the Initial Reclamation Demand and the Supplemental Reclamation Demand are attached hereto respectively as **Exhibit A** and **Exhibit B**³ and are incorporated herein by reference for all purposes.

Dated: New York, New York October 19, 2005

> CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

By: /s/ Steven J. Reisman
Steven J. Reisman (SR 4906)
101 Park Avenue
New York, New York 10178-0061

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E-mail: sreisman@cm-p.com

Counsel for Flextronics International Asia-Pacific Ltd. and Flextronics Technology (M) Sdn. Bhd.

Due to the voluminous nature of the documents supporting the Initial Reclamation Demand and the Supplemental Reclamation Demand, such attached reclamation demands contain only spreadsheets summarizing the goods sought to be reclaimed and the invoices, purchase orders, and/or bills of lading associated therewith. Certain of the Debtors, their related entities, and/or the Debtors' attorneys of record were served with copies of the invoices, bills of lading, and/or delivery orders referenced in the summary spreadsheets, as well as more detailed versions of such spreadsheets.

EXHIBIT A

INITIAL RECLAMATION DEMAND

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

ATTORNEYS AND COUNSELLORS AT LAW
101 PARK AVENUE
NEW YORK, NEW YORK 10178-0061

LONDON STAMFORD
MEXICO CITY WASHINGTON

MUSCAT

PARIS

MILAN

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E-MAIL INFO@CM-P.COM

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October 13, 2005

VIA FEDEX AND TELECOPIER/E-MAIL

Robert S. Miller
Chairman of the Board and Chief Executive
Officer

Delphi Corporation 5725 Delphi Dr. Troy, Michigan 48098

Telecopier: (248) 813-2505

David M. Sherbin, Esq. Vice President and General Counsel

Delphi Corporation 5725 Delphi Dr. Troy, Michigan 48098

Telecopier: (248) 813-2491

John P. Arles Vice President & Treasurer Delphi Automotive Systems LLC 5725 Delphi Drive Troy, Michigan 48098 Telecopier: (248) 813-5055

John K. Lyons, Esq. Skadden, Arps, Slate, Meagher & Flom LLP 333 West Wacker Drive, Suite 2100

Chicago, IL 60606

E-Mail: jlyonsch@skadden.com

Robert J. Dellinger Chief Financial Officer Delphi Corporation 5725 Delphi Dr. Troy, Michigan 48098 Telecopier: (248) 813-2612

John D. Sheehan
Acting Chief Financial Officer, Chief Accounting
Officer & Controller
Delphi Automotive Systems LLC
5725 Delphi Dr.
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Telecopier: (248) 813-2612

John Wm. Butler, Jr., Esq. Skadden, Arps, Slate, Meagher & Flom LLP 333 West Wacker Drive, Suite 2100 Chicago, IL 60606 E-Mail: jbutler@skadden.com

Kayalyn A. Marafioti, Esq. Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, NY 10036 E-Mail: kmarafio@skadden.com

Re: Reclamation Demand of Flextronics International Asia-Pacific Ltd.

Dear Messrs. Miller, Dellinger, Sheehan, Arles, Sherbin, Butler, Lyons and Ms. Marafioti:

This Firm is counsel to Flextronics International Asia-Pacific Ltd. and certain of its affiliates (collectively, "Flextronics").

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP ATTORNEYS AND COUNSELLORS AT LAW Messrs. Miller, Dellinger, Sherbin, Sheehan, Arles, Butler, Lyons and Ms. Marafioti October 13, 2005

On behalf of Flextronics, this letter advises you that, pursuant to Section 546(c) of Title 11 of the United States Code, as amended (the "Bankruptcy Code"), Section 2-702 of the Uniform Commercial Code and the applicable state law, Flextronics hereby demands reclamation of all Flextronics-manufactured goods delivered to, or received by, Delphi Corporation, Delphi Automotive Systems LLC and any of their affiliates (collectively, "Delphi"), on or within ten (10) days before October 8, 2005. The Goods were sold by Flextronics in the ordinary course of its business and were delivered to Delphi within the statutory time period for a valid reclamation claim.

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A copy of supporting documentation for Flextronics's reclamation claim is attached to and incorporated by reference in this letter. Should you need further information, please contact the undersigned.

The aggregate value of the Goods subject to Flextronics' reclamation claim is <u>US\$10,365,274.65</u>. It is possible, however, that Delphi received additional Goods from Flextronics during the reclamation period in excess of this amount. Flextronics reserves its right to increase the reclamation amount and may obtain the necessary documentation and information to support this statement through formal discovery in court proceedings or otherwise.

This letter is intended to serve as Flextronics's written notice that it has made a formal demand for reclamation as provided in Section 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code and under the applicable state law. Accordingly, please refrain from selling, or otherwise disposing of, the Goods, or commingling the Goods with other inventory.

Flextronics will pursue its rights and remedies in law and equity to recover the Goods, subject to the automatic stay instituted pursuant Section 362 of the Bankruptcy Code. This demand letter shall not constitute a waiver of any rights, claims, causes of action, and/or interests under any agreement, at common law, by statute, or in equity, to which Flextronics may be entitled. Furthermore, this demand letter is without prejudice to Flextronics's right to stop delivery of any Goods yet to be received by Delphi.

If you have questions with respect to the foregoing, please contact me at (212) 696-6065. I can also be reached by e-mail at sreisman@cm-p.com.

Sincerely

Steven J. Reisman

Enclosures

cc: Paul Anderson (w/encls., Via E-Mail: <u>paul.anderson@flextronics.com</u>)
Carrie Schiff (w/encls., Via E-Mail: <u>cschiff@flextronics.com</u>)

On October 8, 2005, Delphi Corporation, Delphi Automotive Systems LLC, and certain of their affiliates commenced bankruptcy cases by filing voluntary petitions under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York.

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP ATTORNEYS AND COUNSELLORS AT LAW

Messrs. Miller, Dellinger, Sherbin, Sheehan, Arles, Butler, Lyons and Ms. Marafioti October 13, 2005

Patricia E. Doherty (w/encls., Via E-Mail: patricia.doherty@flextronics.com)
(c/o Flextronics International USA, Inc. on behalf of Flextronics International Asia-Pacific Ltd.)
Jeffrey N. Ostrager, Esq. (w/encls., Via E-Mail: jostrager@cm-p.com)
(Curtis, Mallet-Prevost, Colt & Mosle LLP)

Page 3

Exhibit A -- Summary Chart of Goods Sought to be Reclaimed

<u>Delphi Reference #</u> '5203701702001	Date Delivered 09/26/2005	Due Date/Payment Date 10/16/2005	Currency Code USD	Bill Of Lading APLU896683	Total Amount \$128,700.00
				APLU896683	\$51,321.60
				APLU896683	\$85,536.00
'5203701701001	09/26/2005	11/02/2005	USD	APLU898237	\$134,743.50
'5203701705001	09/26/2005	10/16/2005	USD	APZU418504	\$59,875.20
'5203701704001	09/26/2005	12/02/2005	USD	APZU418504	\$374,472.00
'5203709633001	09/27/2005	11/02/2005	USD	CRXU442156	\$44,914.50
'5203709632001	09/27/2005	12/02/2005	USD	CRXU442156	\$374,472.00
'5203709644001	09/27/2005	10/17/2005	USD	GSTU896125	\$59,875.20
0200100011001	00,21,2000	10/11/2000	000	GSTU896125	\$51,321.60
				GSTU896125	\$102,960.00
'5203718188001	09/28/2005	11/02/2005	USD	125503348	\$8,400.00
'5203718108001	09/28/2005	10/18/2005	USD	5WLX042	\$8,553.60
'5203718111001	09/28/2005	10/18/2005	USD	5WLX516	\$360,360.00
'5203718110001	09/28/2005	10/18/2005	USD	5WLX722	
'5203718179001	09/28/2005	10/18/2005	USD	5WLX780	\$334,620.00
'5203718183001	09/28/2005	10/18/2005	USD		\$4,968.00
'5203718101001				5WLX780	\$49,680.00
5203716101001	09/28/2005	10/18/2005	USD	GSTU954613	\$94,089.60
15000740400004	00/00/0005	44/00/2005	1100	GSTU954613	\$85,536.00
'5203718103001 '5203718105001	09/28/2005	11/02/2005	USD	MLCU470768	\$135,741.60
,	09/28/2005	10/18/2005	USD	NOSU445640	\$128,700.00
'5203718107001	09/28/2005	12/02/2005	USD	NOSU445640	\$374,472.00
'5203727242001	09/29/2005	10/19/2005	USD	5WLX779	\$463,320.00
'5203727243001	09/29/2005	10/19/2005	USD	5WLX841	\$160,160.00
'5203727236001	09/29/2005	12/02/2005	USD	GLDU040342	\$374,472.00
'5203727241001	09/29/2005	11/02/2005	USD	TOLU228192	\$135,741.60
'5203727240001	09/29/2005	11/02/2005	USD	TRLU465138	\$22,457.25
'5203727239001	09/29/2005	12/02/2005	USD	TRLU465138	\$374,472.00
'5203727238001	09/29/2005	10/19/2005	USD	TRLU479468	\$102,960.00
				TRLU479468	\$51,321.60
1500070707007004	00/00/000	44/00/0005	HOD	TRLU479468	\$68,428.80
'5203727237001	09/29/2005	11/02/2005	USD	TRLU618843	\$135,741.60
'5203736304001	09/30/2005	10/20/2005	USD	5WLX940	\$303,160.00
`5203736306001	09/30/2005	10/20/2005	USD	5WLY006	\$514,800.00
'5203736303001	09/30/2005	10/20/2005	USD	5WLY113	\$514,800.00
'5203736305001	09/30/2005	10/20/2005	USD	5WLY114	\$205,920.00
'5203757112001	10/04/2005	10/24/2005	USD	5WLX941	\$514,800.00
'5203757128001	10/04/2005	10/24/2005	USD	5WLY026	\$257,400.00
'5203757126001	10/04/2005	10/24/2005	USD	5WLY266	\$205,920.00
'5203757125001	10/04/2005	10/24/2005	USD	5WLY377	\$514,800.00
'5203757124001	10/04/2005	10/24/2005	USD	5WLY471	\$283,140.00
'5203757113001	10/04/2005	10/24/2005	USD	5WLY671	\$231,660.00
'5203782007001	10/07/2005	12/31/2049	USD	NOSU445470	\$204,682.50
				NOSU445470	\$79,848.00
'5203782008001	10/07/2005	12/31/2049	USD	GATU403815	\$68,428.80
'5203782009001	10/07/2005	12/31/2049	USD	CDVI IAE 4004	\$68,428.80
5203782010001	10/07/2005	12/31/2049		CRXU451204	\$160,488.00
			USD	CRXU451204	\$76,982.40
'5203782011001	10/07/2005	12/31/2049	USD	5WLY547	\$334,620.00
'5203782012001	10/07/2005	12/31/2049	USD	5WLY674	\$411,840.00
'5203782024001	10/07/2005	12/31/2049	USD	TEXU492257	\$34,214.40
'5203782025001	10/07/2005	12/31/2049	USD	TEXU492257	\$167,467.50
'5203782026001	10/07/2005	12/31/2049	USD	TRLU431884	\$134,743.50
'5203782032001	10/07/2005	12/31/2049	USD	GSTU630689	\$134,743.50

Page 1 of 1 **Total \$10,365,274.65**

EXHIBIT B

SUPPLEMENTAL RECLAMATION DEMAND

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

FRANKFURT MUSCAT
HOUSTON PARIS
LONDON STAMFORD
MEXICO CITY WASHINGTON
MILAN

ATTORNEYS AND COUNSELLORS AT LAW

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WRITER'S DIRECT:
TELEPHONE 212-696-6065
E-Mail SREISMAN@CM-P.COM

October 18, 2005

To the Addressees on Schedule 1 attached hereto

Re: First Supplemental Reclamation Demand of Flextronics International Asia-Pacific Ltd. and Flextronics Technology (M) Sdn. Bhd.

Dear Ladies and Gentlemen:

This Firm is counsel to Flextronics International Asia-Pacific Ltd., Flextronics Technology (M) Sdn. Bhd.² and certain of their affiliates (collectively, "Flextronics").

This reclamation demand (the "<u>Supplemental Demand</u>") supplements, and is in addition to, the reclamation demand sent by Flextronics on October 13, 2005 (the "<u>Initial Demand</u>"). To extent this Supplemental Demand is duplicative of the Initial Demand, the Initial Demand shall govern.

On behalf of Flextronics, this Supplemental Demand advises you that, pursuant to Section 546(c) of Title 11 of the United States Code, as amended (the "Bankruptcy Code"), Section 2-702 of the Uniform Commercial Code and the applicable state law, Flextronics hereby demands reclamation of all Flextronics-manufactured goods delivered to, or received by, Delphi Corporation, Delphi Automotive Systems LLC, Delphi Product and Service Solutions, Delphi Consumer Electronics and any of their affiliates (collectively, "Delphi"), on or within ten (10) days before October 8, 2005 (the "Goods"). The Goods were sold by Flextronics in the ordinary course of its business and were delivered to Delphi within the statutory time period for a valid reclamation claim.

A copy of supporting documentation for Flextronics's reclamation claim is attached to, and incorporated by reference in, this Supplemental Demand. Attached hereto as **Exhibit A** is a chart summarizing the Goods received by Delphi. Should you need further information, please contact the undersigned.

In certain of the documentation with the Debtors regarding the Goods (each as defined below), Flextronics International Asia-Pacific Ltd. is sometimes referred to as "Flextronics Asia-Pacific Ltd."

In certain of the documentation with the Debtors regarding the Goods (each as defined below), Flextronics Technology (M) Sdn. Bhd.² is sometimes referred to as "Flextronics Technology (Mauritius) S/B."

On October 8, 2005, Delphi Corporation, Delphi Automotive Systems LLC, and certain of their affiliates commenced bankruptcy cases by filing voluntary petitions under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York.

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP ATTORNEYS AND COUNSELLORS AT LAW

Page 2

October 18, 2005

The aggregate value of the Goods subject to Flextronics' reclamation claim is <u>US\$15.077.160.75</u>. It is possible, however, that Delphi received additional Goods from Flextronics during the reclamation period in excess of this amount. Flextronics reserves its right to increase the reclamation amount and may obtain the necessary documentation and information to support this statement through formal discovery in court proceedings or otherwise.

This Supplemental Demand is intended to serve as Flextronics's written notice that it has made a formal demand for reclamation as provided in Section 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code and under the applicable state law. Accordingly, please refrain from selling, or otherwise disposing of, the Goods, or commingling the Goods with other inventory.

Flextronics will pursue its rights and remedies in law and equity to recover the Goods, subject to the automatic stay instituted pursuant Section 362 of the Bankruptcy Code. This demand letter shall not constitute a waiver of any rights, claims, causes of action, and/or interests under any agreement, at common law, by statute, or in equity, to which Flextronics may be entitled. Furthermore, this demand letter is without prejudice to Flextronics's right to stop delivery of any Goods yet to be received by Delphi.

If you have questions with respect to the foregoing, please contact me at (212) 696-6065. I can also be reached by e-mail at sreisman@cm-p.com.

Sincerely,

Steven J. Reisman

ten Sleimeren.

Enclosures

cc: Paul Anderson (w/encls., Via E-Mail: paul.anderson@flextronics.com)

Carrie Schiff, Esq. (w/encls., Via E-Mail: cschiff@flextronics.com)

Patricia E. Doherty (w/encls., Via E-Mail: patricia.doherty@flextronics.com)

(c/o Flextronics International USA, Inc. on behalf of Flextronics International Asia-Pacific Ltd.)

Jeffrey N. Ostrager, Esq. (w/encls., Via E-Mail: jostrager@cm-p.com)

(Curtis, Mallet-Prevost, Colt & Mosle LLP)

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP
ATTORNEYS AND COUNSELLORS AT LAW

Page 3

October 18, 2005

SCHEDULE 1

VIA FEDEX

Robert S. Miller Chairman of the Board and Chief Executive Officer Delphi Corporation 5725 Delphi Drive Troy, Michigan 48098

VIA FEDEX

Robert J. Dellinger Chief Financial Officer Delphi Corporation 5725 Delphi Drive Troy, Michigan 48098

VIA FEDEX AND E-MAIL

David M. Sherbin, Esq. Vice President and General Counsel Delphi Corporation 5725 Delphi Drive Troy, Michigan 48098 E-Mail: david.sherbin@delphi.com

VIA FEDEX

John D. Sheehan
Acting Chief Financial Officer,
Chief Accounting Officer and Controller
Delphi Automotive Systems LLC
5725 Delphi Drive
Troy, Michigan 48098
E-Mail: john.sheehan@delphi.com

VIA FEDEX

John P. Arle Vice President and Treasurer Delphi Automotive Systems LLC 5725 Delphi Drive Troy, Michigan 48098

VIA EXPRESS MAIL

Francisco A. Ordonez President Delphi Product and Service Solutions 1441 West Long Lake Road P.O. Box 5090 Troy, Michigan 48098-5090

VIA FEDEX

Delphi Consumer Electronics 1441 West Long Lake Road Troy, Michigan 48098-5090 Attn.: President and/or Chief Financial Officer

VIA FEDEX AND E-MAIL

John Wm. Butler, Jr., Esq. Skadden, Arps, Slate, Meagher & Flom LLP 333 West Wacker Drive, Suite 2100 Chicago, Illinois 60606 E-Mail: jbutler@skadden.com CURTIS, MALLET-PREVOST, COLT & MOSLE LLP ATTORNEYS AND COUNSELLORS AT LAW

Page 4

October 18, 2005

VIA FEDEX AND E-MAIL

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Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
E-Mail: <u>ilyonsch@skadden.com</u>

VIA FEDEX AND E-MAIL

Kayalyn A. Marafioti, Esq. Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, New York 10036 E-Mail: kmarafio@skadden.com

Exhibit A -- Summary Chart of Goods Sought to be Reclaimed

	Document	Due Date /			
Document #	<u>Date</u>	Payment Date	Bill Of Lading	Total Amount	PO#
'5203653118001	09/19/2005	10/09/2005	5WLX294	\$180,180.00	D0550076669
'5203653119001	09/19/2005	10/09/2005	5WLX368	\$334,620.00	D0550076669
'5203653120001	09/19/2005	11/02/2005	NOSU433921	\$134,743.50	D0550036944
			NOSU433921	\$18,607.50	D0550036944
'5203670029001	09/21/2005	10/11/2005	5WLX434	\$257,400.00	D0550076669
'5203670031001	09/21/2005	11/02/2005	APLU895453	\$390,757.50	D0550036944
'5203670030001	09/21/2005	11/02/2005	APZU409276	\$390,757.50	D0550036944
'5203670056001	09/21/2005	11/02/2005	NOSU432119	\$135,741.60	D0550036944
			NOSU432119	\$18,607.50	D0550036944
'5203678675001	09/22/2005		GSTU934940	\$390,757.50	D0550036944
'5203678677001	09/22/2005	11/02/2005	GSTU951804	\$134,743.50	D0550036944
			GSTU951804	\$18,607.50	D0550036944
'5203687374001	09/23/2005	10/13/2005		\$308,880.00	D0550076669
'5203687380001	09/23/2005	12/02/2005	APZU411150	\$561,708.00	D0550036717
					D0550036717
'5203687382001	09/23/2005		GSTU747784	\$130,252.50	D0550036944
'5203687383001	09/23/2005		GSTU747784	\$374,472.00	D0550036944
'5203687377001	09/23/2005		INNU521742	\$134,743.50	D0550036944
'5203687381001	09/23/2005		NOSU433304	\$134,743.50	D0550036944
'5203687378001	09/23/2005	11/02/2005	NOSU437747	\$134,743.50	D0550036944
			NOSU437747	\$18,607.50	D0550036944
'5203687379001	09/23/2005	12/02/2005	NOSU454983	\$508,212.00	D0550036717
					D0550036718
'5203701702001	09/26/2005	10/16/2005	APLU896683	\$128,700.00	D0550076669
			APLU896683	\$51,321.60	D0550076669
			APLU896683	\$85,536.00	D0550076669
'5203701701001	09/26/2005		APLU898237	\$134,743.50	D0550036944
'5203701705001	09/26/2005	10/16/2005	APZU418504	\$59,875.20	D0550036717
'5203701704001	09/26/2005		APZU418504	\$374,472.00	D0550036717
'5203709633001	09/27/2005	11/02/2005	CRXU442156	\$44,914.50	D0550036717
'5203709632001	09/27/2005	12/02/2005	CRXU442156	\$374,472.00	D0550036717
'5203709644001	09/27/2005		GSTU896125	\$59,875.20	D0550076669
			GSTU896125	\$51,321.60	D0550076669
			GSTU896125	\$102,960.00	D0550076669
'5203718188001	09/28/2005	11/02/2005	125503348	\$8,400.00	D0550036944
'5203718108001	09/28/2005	10/18/2005	5WLX042	\$8,553.60	D0550076669
'5203718111001	09/28/2005	10/18/2005	5WLX516	\$360,360.00	D0550076669
'5203718110001	09/28/2005	10/18/2005	5WLX722	\$334,620.00	D0550076669
'5203718179001	09/28/2005	10/18/2005	5WLX780	\$4,968.00	D0450135784
'5203718183001	09/28/2005	10/18/2005	5WLX780	\$49,680.00	D0450135784
'5203718101001	09/28/2005	10/18/2005	GSTU954613	\$94,089.60	D0550076669
			GSTU954613	\$85,536.00	D0550076669
'5203718103001	09/28/2005		MLCU470768	\$135,741.60	D0550036944
'5203718105001	09/28/2005	10/18/2005	NOSU445640	\$128,700.00	D0550076669
'5203718107001	09/28/2005	12/02/2005	NOSU445640	\$374,472.00	D0550076669
'5203727242001	09/29/2005	10/19/2005	5WLX779	\$463,320.00	D0550076669

Exhibit A -- Summary Chart of Goods Sought to be Reclaimed

	<u>Document</u>	Due Date /			
Document #	<u>Date</u>	Payment Date	Bill Of Lading	Total Amount	<u>PO#</u>
'5203727243001	09/29/2005	10/19/2005		\$160,160.00	D0550076669
'5203727236001	09/29/2005	12/02/2005	GLDU040342	\$374,472.00	D0550036717
'5203727241001	09/29/2005	11/02/2005	TOLU228192	\$135,741.60	D0550036944
'5203727240001	09/29/2005	11/02/2005	TRLU465138	\$22,457.25	D0550036717
'5203727239001	09/29/2005		TRLU465138	\$374,472.00	D0550036717
'5203727238001	09/29/2005	10/19/2005	TRLU479468	\$102,960.00	D0550076669
					D0550076669
			TRLU479468	\$51,321.60	D0550076669
			TRLU479468	\$68,428.80	D0550076669
'5203727237001	09/29/2005		TRLU618843	\$135,741.60	D0550036944
'5203736304001	09/30/2005	10/20/2005		\$303,160.00	D0550076669
'5203736306001	09/30/2005	10/20/2005		\$514,800.00	D0550076669
'5203736303001	09/30/2005	10/20/2005		\$514,800.00	D0550076669
'5203736305001	09/30/2005	10/20/2005		\$205,920.00	D0550076669
'5203757112001	10/04/2005	10/24/2005		\$514,800.00	D0550076669
'5203757128001	10/04/2005	10/24/2005		\$257,400.00	D0550076669
'5203757126001	10/04/2005	10/24/2005		\$205,920.00	D0550076669
'5203757125001	10/04/2005	10/24/2005		\$514,800.00	D0550076669
'5203757124001	10/04/2005	10/24/2005		\$283,140.00	D0550076669
'5203757113001	10/04/2005	10/24/2005		\$231,660.00	D0550076669
'5203782007001	10/07/2005	12/31/2049	NOSU445470	\$204,682.50	D0550036944
1,500,000,000,000			NOSU445470	\$79,848.00	D0550036944
'5203782008001	10/07/2005	12/31/2049	GATU403815	\$68,428.80	D0550076669
1=000=000000000000000000000000000000000	40.07/0000	1010110010		\$68,428.80	D0550076669
'5203782009001	10/07/2005		CRXU451204	\$160,488.00	D0550036717
'5203782010001	10/07/2005		CRXU451204	\$76,982.40	D0550036717
'5203782011001	10/07/2005	12/31/2049		\$334,620.00	D0550076669
'5203782012001	10/07/2005	12/31/2049		\$411,840.00	D0550076669
'5203782024001	10/07/2005		TEXU492257	\$34,214.40	D0550076669
'5203782025001	10/07/2005		TEXU492257	\$167,467.50	D0550076669
'5203782026001	10/07/2005		TRLU431884	\$134,743.50	D0550036944
'5203782032001	10/07/2005	12/31/2049	GSTU630689	\$134,743.50	D0550036944

Total \$15,077,160.75

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CERTIFICATE OF SERVICE

I hereby certify that, on the 19th day of October 2005, I caused a true and correct copy of the Notice of Reclamation Demand to be served by United States first-class mail to the parties on the attached Service List.

Dated: New York, New York October 19, 2005

/s/ John C.V. Katsanos

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